Corporation

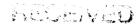
MCI

1801 Pennsylvania Avenue, NW Washington, DC 20006 202 887 2551 FAX 202 887 2676

MCI Telecommunications

EX PARTE OR LATE FILEDORIGINAL

Mary L. Brown Senior Policy Counsel Federal Law and Public Policy



January 26, 1999

JAN 26 1999

Magalie Roman Salas Secretary Federal Communications Commission Washington, D.C. 20554 PERMITTAL CONTRACTOR OF THE CO

Re: EX PARTE in Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket No. 96-115, Implementation of the Non-Accounting Safeguards of Sections 271 and 272, CC Docket No. 96-149

Dear Ms. Salas:

On January 22, 1999, MCI WorldCom, Inc. met with staff members of the Common Carrier Bureau to discuss the above-captioned proceedings. Present at the meeting were Margaret Egler, Bill Agee, Peter Wolfe, Anthony Mastano, and Eric Einhorn. Representing MCI WorldCom, Inc. were Lanese Jorgenson, Sherry Lichtenberg, and myself. Attached are the presentation materials that were provided to staff at the meeting.

Sincerely,

Mary L. Brown

Main L Bu

CC: Margaret Egler

Bill Agee Peter Wolfe

Anthony Mastano

Eric Einhorn

No. of Copies rec'd 0+4 List ABCDE

CPNI Rules: New York local marketing experience

CC Docket Nos. 96-115, 96-149
Presentation by MCI WorldCom
January 22, 1999

Sales process

- Outbound telemarketing representative calls a prospect
- If the prospect responds positively to the sales proposition:
 - rep must ask permission to query Bell Atlantic
 Customer Service Record (CSR)
 - the representative queries the CSR through the GUI interface

Bell Atlantic CSR

- MCI WorldCom has "stripped" the CSR of its CPNI content. Our reps see only:
 - Customer name
 - Billing telephone number
 - Address
 - Directory listing information
- Reps do not see:
 - Features, spending levels, any other CPNI

Order processing

- To install customer, MCI WorldCom must "recreate" local service data from scratch
 - Match customer names (our data vs. BA's)
 - Match customer address (our data vs. BA's)
 - Billed phone number v. working phone number
 - Features
 - Inside wire contract

Impact on MCI WorldCom

- Can't sell features or inside wire maintenance plan as well as the incumbent can
- Can't sell other services within the local "total service offering" as well as incumbent can
- Can't notify the customer of features that the customer has forgotten or doesn't know that they have -- e.g., ISW contracts (55% take rate in NY)
- Can't "match" the services that the customer has with incumbent

Submission of local order to BA

- MCI verifies information and transmits to BA for installation
- If the local order is not correct, the order is rejected
- BA creates new CSR, takes old CSR out of its system, and passes new record to MCI WorldCom

 $-2\pi \frac{1}{4} \frac{1}{4} = -4\pi A_{1} A_{2} + 3\pi A_{2} A_{3} + 3\pi A_{3} A_{4} + 3\pi A_{2} A_{3} + 3\pi A_{3} A_{4} + 3\pi A_{3} A_{4} + 3\pi A_{4} A_{5} + 3\pi A_{5} A_{5}$

NY: "Best price" rule

- In NY, the PSC says the local customer is entitled to make an informed choice in local providers, including rate information
- Without access identical to what incumbent has (name, address, directory listing, features, other services), accurate comparison information cannot be provided

BA 272 affiliate has lots of CPNI advantages

- 272 affiliate can engage in local and long distance
- No consent required
 - Immediate access to: name, address, billing phone, working phone, directory listing information, features, inside wire agreement, usage information

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Lessons

- Allow new entrants to use CPNI to initiate service
 - Customers deserve price comparisons and detailed product disclosure
 - For purposes of initiating service, we do not need usage CPNI
- For all other purposes, require both Bell 272 affiliates, and new entrants, to obtain most CPNI upon oral consent

Go to Service Request Page

Customer Service Record

View the RAW EIF File

	Adminis	strative D	ata Table	
Billing Telephone Number			2128316684	
Customer Indicator			R	
Version			AA	
Customer Negotiator Name			Sherry Lichtenberg	
Purchase Order Number		19990115152943 MCIL		
Customer ID				
Customer Negotiator Telephone Number			3013603412	
Business Segment			R	
	Custom	ner Servic		
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	DIR			
DEL	1,1		I 8-6-98	
	BILL			
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BA1	APT 18F		8-10-98	
BA2	1755 YORK AV		8-10-98	
PO	NEW YORK NY			
	10128		8-10-98	
LB	01000			
STI	LSSA 07-06-98			
SS	186-60-3649KS, Y		8-6-98	
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LINE CHARGE++

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1	PSEBO	/PROX Y (Access Code Restriction) I 12-28-98	
1		/LCC JTB (Blocking Service Charge) I 12-28-98	
1	VMH3A	/RCYC 3/MWI /CFNB 212	
		369-6608/CFND 212	
		369-6608 (Home Voice Mail Advantage) T 8-6-98	
1	9ZR	FCC LINE CHARGE	
		LOCAL SERVICE	
		AMOUNT SUBJECT TO FED &	
		LOC TAX	
		AMOUNT NOT SUBJECT TO	
		FED & LOC TAX	
		AMOUNT SUBJECT TO FED	
		NOT LOC TAX	
		AMOUNT SUBJECT TO LOC	
		NOT FED TAX	
		PURCHASE ORDER NUMBERS	
		C1XA5998Q 12-28-98	
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